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FAXED
5-5-04

VIA FACSIMILE

May 5, 2004

Cynthia W. Lie, Esq.
Assistant United States Attorney
1 Courthouse Way, Suite 9200
Boston, MA 02210

RE: *United States v. Christopher Sugar*
Case No. 03-cr-10362-PBS

Dear Attorney Lie,

Pursuant to Fed. R. Crim. P.12(d)(2), 16(a), and 26.2, *Brady v. Maryland*, 373 U.S. 83 (1963), and all other applicable rules and statutes, in addition to the additional discovery I requested on May 3, 2004, I am writing to request the following discovery.

1. **Information regarding the Phelps County, Missouri Sheriff's Department:**

- (a) Names of any drug dogs used by the Phelps County, Missouri Sheriff's Department.
- (b) Names of any drug dog handlers in the Phelps County, Missouri Sheriff's Department.
- (c) Information regarding motor vehicle stops made by the Phelps County, Missouri Sheriff's Department where no drug dog was called in to assist.
- (d) Information regarding the percentage of motor vehicle stops involving motor vehicles that are not cars or pickup trucks (i.e., vans, delivery trucks, semi tractor-trailers, motor homes, recreational vehicles, etc.)
- (e) Information regarding the percentage of stops made of vehicles with out-of-state (i.e., non-Missouri) license plates.
- (f) Any and all rough notes of the deputies and/or sheriff of the Phelps




County, Missouri Sheriff's Department that interviewed of the defendant and all co-defendants.

2. Information regarding the Drug Enforcement Agency:

- (a) Any and all departmental or organizational policies, rules, rules, directives, memoranda and operating procedures that define or outline the use of written statements and tape recording and video recording of interviews for the Missouri DEA and Boston DEA.
- (b) Any and all rough notes of the DEA agents that interviewed of the defendant and all co-defendants.

Thank you for your attention to this matter. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Mark W. Shea', is written over a light blue rectangular background.

Mark W. Shea